

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Kate R. Buck
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*Counsel for NStar Electric Company, Eastern
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Company, Yankee Gas Services Company,
Public Service Company of New Hampshire,
Consolidated Edison Company of New York,
Inc., Orange and Rockland Utilities, Inc.,
PECO Energy Company, The Potomac
Electric Power Company, Delmarva Power &
Light Company, Atlantic City Electric
Company, Potomac Edison Company, Jersey
Central Power & Light Company, Boston Gas
Company, KeySpan Energy Delivery Long
Island, KeySpan Energy Delivery New York,
Massachusetts Electric Company, Public
Service Electric and Gas Company and
Baltimore Gas and Electric Company*

In re:

MODELL'S SPORTING GOODS,
INC., *et al.*,

Debtors.

Chapter 11

Case No. 20-14179 (VFP)

Jointly Administered

Honorable Vincent F. Papalia

**DECLARATION OF WALTER LARNERD OF FIRSTENERGY CORP.
IN SUPPORT OF RESPONSE OF CERTAIN UTILITY COMPANIES
TO THE ORDER TEMPORARILY SUSPENDING THE DEBTORS'
CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305**

I, Walter Larnerd, declare as follows:

1. I am a Supervisor, Revenue Assurance, with FirstEnergy Corp. ("FirstEnergy"), and I have been in that position for 6 years and with FirstEnergy for 12 years. In my current position with FirstEnergy, I manage or participate in the management of customer and credit services, including the customer bankruptcy operations of Potomac Edison Company ("PE").

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of PE's business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of PE. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of PE, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors' Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the "Response").

4. In making this Declaration, I am familiar with the contents of the Response.

5. It is part of my job responsibility with FirstEnergy to: (A) review customer accounts with PE; (B) address credit issues with PE's customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit "A" is a chart reflecting the (i) redacted post-petition account number, (ii) service address, (iii) invoice amount, (iv) invoice bill date and (v) invoice due date.

7. Exhibit "A" reflects that PE issued two post-petition invoices to the Debtors totaling \$930.77.

8. PE has not received payment for any of the post-petition invoices set forth in

Exhibit "A."

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 22nd day of April 2020, at Fairmont, West Virginia.

/s/ Walter Larnerd
Walter Larnerd

EXHIBIT "A"

Potomac Edison Company

Modell Sporting Coods
20900B Frederick Rd
Germantown MD 20876
Account # 2362

Service Dates From 03/11/2020 - 4/21/2020

Invoice Date	Bill From	Bill To	Description	Due Date	Bill Amount	Amount Paid	Date Paid
			Past Due Balance				
3/20/2020	3/11/2020	3/19/2020	Potomac Edison Charges	4/6/2020	\$348.59		
			Direct Energy Business- Duel Bill		\$0.00		
4/22/2020	3/20/2020	4/20/2020	Potomac Edison Charges	5/7/2020	\$582.18		
			Direct Energy Business- Duel Bill				

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Inc., Orange and Rockland Utilities, Inc.,
PECO Energy Company, The Potomac
Electric Power Company, Delmarva Power &
Light Company, Atlantic City Electric
Company, Potomac Edison Company, Jersey
Central Power & Light Company, Boston Gas
Company, KeySpan Energy Delivery Long
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Massachusetts Electric Company, Public
Service Electric and Gas Company and
Baltimore Gas and Electric Company*

In re:

MODELL'S SPORTING GOODS,
INC., *et al.*,

Debtors.

Chapter 11

Case No. 20-14179 (VFP)

Jointly Administered

Honorable Vincent F. Papalia

**DECLARATION OF NIKEYA JACOBS OF THE POTOMAC ELECTRIC POWER
COMPANY IN SUPPORT OF RESPONSE OF CERTAIN
UTILITY COMPANIES TO THE ORDER TEMPORARILY SUSPENDING THE
DEBTORS' CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305**

I, Nikeya Jacobs, declare as follows:

1. I am a Credit Analyst for The Potomac Electric Power Company (“Pepco”) and I have been with the Pepco Credit Department for 5 years. In my current position with Pepco, I assist in the credit and bankruptcy operations.

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of Pepco’s business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of Pepco. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of Pepco, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors’ Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the “Response”).

4. In making this Declaration, I am familiar with the contents of the Response.

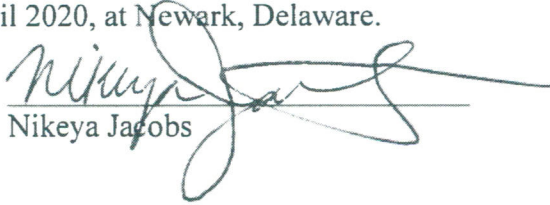
5. It is part of my job responsibility with Pepco to: (A) review customer accounts with Pepco; (B) address credit issues with Pepco’s customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit “A” is a chart reflecting five (5) post-petition invoices issued by Pepco to the Debtors totaling \$2,624.38. Exhibit “A” reflects (i) redacted post-petition account numbers, (ii) service addresses, (iii) the post-petition service period for each invoice, (iv) invoice amount, and (v) invoice due date.

7. Pepco has not received payment for any of the post-petition invoices set forth in Exhibit “A.”

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
and correct to the best of my knowledge, information, and belief.

Executed this 22 day of April 2020, at Newark, Delaware.



Nikeya Jacobs

EXHIBIT "A" Pepco

Account Name	Post-Petition Account	Service Address	Bill Period	Total	Due Date	Date Paid
DC						
MODELLS DC II INC	*****5706	3100 14TH ST NW #112 WASHINGTON	3/12 - 4/7	\$367.20	4/29/2020	
MODELLS DC LLC	*****5771	3100 14TH ST NW #111 WASHINGTON	3/12 - 4/7	\$655.98	4/29/2020	
MODELLS DC II INC T/A MODEL	*****5257	1518 BENNING RD NE WASHINGTON D	INVOICE PENDING			
MD						
MODELL'S SPORTING GOODS	*****7710	1761 RITCHIE STATION CT CAPITOL HEI	3/12- 4/6	\$903.80	4/28/2020	
MODELL'S MARYLAND INC T/A N	*****8031	7201 WISCONSIN AVE GND BETHESDA	3/12- 4/3	\$145.46	4/27/2020	
MODELL'S MARYLAND INC T/A N	*****8866	7409 GREENBELT RD GREENBELT MD 2	3/12- 4/10	\$551.94	5/4/2020	
FILED:3/11/2020						
CH: 11						
BANKRUPTCY COURT: NEW JERSEY CASE #20-14179						

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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Kate R. Buck James A. Kellar McCARTER & ENGLISH, LLP 100 Mulberry Street Newark, New Jersey 07102 (973) 622-4444 kbuck@mccarter.com , jkellar@mccarter.com	
<i>Counsel for NStar Electric Company, Eastern Massachusetts, Connecticut Light & Power Company, Yankee Gas Services Company, Public Service Company of New Hampshire, Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., PECO Energy Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Potomac Edison Company, Jersey Central Power & Light Company, Boston Gas Company, KeySpan Energy Delivery Long Island, KeySpan Energy Delivery New York, Massachusetts Electric Company, Public Service Electric and Gas Company and Baltimore Gas and Electric Company</i>	
In re: MODELL'S SPORTING GOODS, INC., et al., Debtors.	Chapter 11 Case No. 20-14179 (VFP) Jointly Administered Honorable Vincent F. Papalia

**DECLARATION OF MATTHEW J. COONEY FROM PUBLIC SERVICE ELECTRIC
AND GAS COMPANY IN SUPPORT OF RESPONSE OF CERTAIN
UTILITY COMPANIES TO THE ORDER TEMPORARILY SUSPENDING THE
DEBTORS' CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305**

I, Matthew J. Cooney declare as follows:

1. I am a Supervisor Back Office Collections, Industrial and Commercial, for Public Service Electric and Gas Company ("PSE&G") and I have been with PSE&G for 11 years. In my current position with PSE&G, I assist in the credit and bankruptcy operations.

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of PSE&G's business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of PSE&G. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of PSE&G, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors' Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the "Response").

4. In making this Declaration, I am familiar with the contents of the Response.

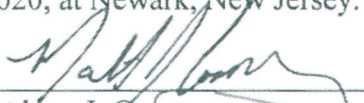
5. It is part of my job responsibility with PSE&G to: (A) review customer accounts with PSE&G; (B) address credit issues with PSE&G's customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit "A" is a chart reflecting eighteen (18) post-petition invoices issued by PSE&G to the Debtors totaling \$4,911.76. Exhibit "A" reflects (i) redacted post-petition account numbers, (ii) service addresses, (iii) the post-petition service period for each invoice, (iv) invoice amount, and (v) invoice due date.

7. PSE&G has not received payment for any of the post-petition invoices set forth in Exhibit "A."

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
and correct to the best of my knowledge, information, and belief.

Executed this 20 day of April 2020, at Newark, New Jersey.



Matthew J. Cooney

EXHIBIT "A"

PSE&G

Post Petition SAP#	ACCOUNT NAME	ADDRESS	INVOICE DATE	SERVICE PERIOD	BILL AMOUNT	DUE DATE
xxxxxx4601	Henry Modelle Inc	443 58th St West New York	N/A			
xxxxxx3801	Model's	1601 W Edgar Rd STE1 Linden	N/A			
xxxxxx4118	Henry Modell & Co Inc	5700 Bergenline Ave FL3 West New York	4/8/2020	3/12/2020 - 4/7/2020	\$ 50.53	4/24/2020
xxxxxx9507	Model's Sporting Goods	2501Route 130S STE A Cinnaminson	3/23/2020	3/12/2020 - 3/20/2020	\$ 370.21	4/8/2020
xxxxxx8503	Model's Sporting Goods	3101 Kennedy Blvd SP A3B North Bergen	N/A			4/7/2020
xxxxxx2605	Model's Sporting Goods	463 Green St Woodbridge	3/18/2020	3/12/2020 - 3/19/2020	\$ 127.80	
xxxxxx4503	Model's Sporting Goods	1014 RTE 9 Sayreville	4/8/2020	3/12/2020 - 4/7/2020	\$ 211.10	4/24/2020
xxxxxx8805	Model's Sporting Goods	1065 Bloomfield Ave ST6A Clifton	N/A			
xxxxxx8902	Model's Sporting Goods	1065 Bloomfield Ave ST6B Clifton	N/A			
xxxxxx4508	Model's Sporting Goods	301 Main St #203-130 Paterson	4/7/2020	3/12/2020 - 4/6/2020	\$ 401.32	4/23/2020
xxxxxx9305	Model's Sporting Goods	1710 US Highway 46W West Paterson	N/A			
xxxxxx0300	MODELLS	1515 US Highway 22 BLG2 S11 Watchung	3/31/2020	3/12/2020 - 3/31/2020	\$ 325.01	4/17/2020
xxxxxx9518	Model's Sporting Goods	2232 Marlton Pike W Retail 3 Cherry Hill	N/A			
xxxxxx9607	Model's Sporting Goods	2232 Marlton Pike W Models Cherry Hill	N/A			
xxxxxx0904	Henry Modell Inc.	5714 Bergenline Ave STR West New York	4/8/2020	3/12/2020 - 4/7/2020	\$ 883.24	4/24/2020
xxxxxx2009	Henry Modell Inc.	5716 Bergenline Ave West New York	4/8/2020	3/12/2020 - 4/7/2020	\$ 461.20	4/24/2020
xxxxxx0004	Model's Sporting Goods	270 Passaic Ave Kearny	3/31/2020	3/12/2020 - 3/31/2020	\$ 369.11	4/17/2020
xxxxxx9704	Model's Sporting Goods	2839 JOHN f Kennedy Blvd Str Jersey City	N/A			
xxxxxx7402	Model's Sporting Goods	1255 Raritan Rd A-1 Clark	3/27/2020	3/12/2020 - 3/20/2020	\$ 123.71	4/14/2020
xxxxxx0608	Model's New Jersey Inc	Spring St & Rte 22 STRB Union	3/20/2020	3/12/2020 - 3/18/2020	\$ 59.42	4/7/2020
xxxxxx7518	Models Sporting Goods	345 US Highway 202/206 Bridgewater	3/31/2020	3/12/2020 - 3/25/2020	\$ 261.55	4/21/2020
xxxxxx5105	Models Sporting Goods	350 Marketplace Blvd Hamilton	3/25/2020	3/12/2020 - 3/23/2020	\$ 273.32	4/13/2020
xxxxxx1307	Henry's Modell's Inc	473 River Rd STE C2	3/27/2020	3/12/2020 - 3/26/2020	\$ 301.45	4/14/2020
xxxxxx2300	Modells	611 Washington Blvd Jersey City	3/26/2020	3/12/2020 - 3/25/2020	\$ 220.03	4/13/2020
xxxxxx9801	Model's	979B US Highway 1 North Brunswick	N/A			
xxxxxx9107	Modell Sporting Goods	165 E State Rt 4 STE 3A Paramus	3/26/2020	3/12/2020 - 3/25/2020	\$ 228.68	4/13/2020
xxxxxx3609	Model's Sporting Goods	189 RTE 46 Saddle Brook	3/24/2020	3/12/2020 - 3/23/2020	\$ 237.60	4/9/2020
xxxxxx1202	Model's Sporting Goods	224 Bloomfield Ave Bloomfield	N/A			
xxxxxx9300	Model's Sporting Goods	75 Interstate Shop CTR Ramsey	3/26/2020	3/12/2020 - 3/23/2020	\$ 6.48	4/13/2020

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<i>Counsel for NStar Electric Company, Eastern Massachusetts, Connecticut Light & Power Company, Yankee Gas Services Company, Public Service Company of New Hampshire, Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., PECO Energy Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Potomac Edison Company, Jersey Central Power & Light Company, Boston Gas Company, KeySpan Energy Delivery Long Island, KeySpan Energy Delivery New York, Massachusetts Electric Company, Public Service Electric and Gas Company and Baltimore Gas and Electric Company</i>	
In re: MODELL'S SPORTING GOODS, INC., et al., Debtors.	Chapter 11 Case No. 20-14179 (VFP) Jointly Administered Honorable Vincent F. Papalia

**DECLARATION OF PAWEL SAKOWSKI OF CONNECTICUT LIGHT & POWER
COMPANY, YANKEE GAS SERVICES COMPANY AND PUBLIC SERVICE COMPANY
OF NEW HAMPSHIRE IN SUPPORT OF RESPONSE OF CERTAIN
UTILITY COMPANIES TO THE ORDER TEMPORARILY SUSPENDING THE
DEBTORS' CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305**

I, Pawel Sakowski declare as follows:

1. I am the Supervisor, Credit and Collections Operations for Eversource Energy Service Company (“Eversource Service”), and I have been Supervisor, Credit and Collections Operations since 2017 and have been employed with Eversource Service for 12 years. In my current position with Eversource Service, I manage or participate in the management of customer and credit services, including the customer bankruptcy operations, of the following operating companies: Connecticut Light & Power Company (“CL&P”), Yankee Gas Services Company (“Yankee Gas”) and Public Service Company of New Hampshire (“PSNH”) (collectively, “Eversource”).

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of Eversource’s business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of Eversource. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of Eversource, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors’ Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the “Response”).

4. In making this Declaration, I am familiar with the contents of the Response.

5. It is part of my job responsibility with Eversource to: (A) review customer accounts with Eversource; (B) address credit issues with Eversource’s customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit “A” is a chart reflecting (i) redacted post-petition account numbers, (ii) service addresses, (iii) the post-petition service period for each invoice, (iv) invoice amount, and (v) invoice due date.

7. Exhibit “A” reflects that (i) CL&P issued six post-petition invoices to the Debtors totaling \$2,927.57, (ii) Yankee Gas issued two post-petition invoices to the Debtors totaling \$308.23, and (iii) PSNH issued one post-petition invoice to the Debtors in the amount of \$1,365.28.

8. Eversource has not received payment for any of the post-petition invoices set forth in Exhibit “A.”

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 22nd day of April 2020, at Windsor, Connecticut.

/s/ Pawel Sakowski
Pawel Sakowski

EXHIBIT "A"

Service Address	Last 4 digits of Account	Invoice Date #1	Service Period # 1	Bill Amount #1
<u>CL&P</u>				
26 6TH ST UNIT 3-205 STAMFORD CT 06905	9063	4/6/2020	3/11/20 - 3/17/20	\$265.65
26 6TH ST UNIT 3-205E STAMFORD CT 06905	9008	4/6/2020	3/11/20 - 3/16/20	\$80.09
3073 BERLIN TPKE STR 10 NEWINGTON CT 06111	9056	4/8/2020	3/11/20 - 3/13/20	\$91.80
<u>Yankee Gas</u>				
2113 SUMMER ST STAMFORD CT 06905	9098	3/17/2020	3/11/20 - 3/17/20	\$107.25
<u>PSNH</u>				
56261319057	9057	3/27/2020	3/11/20 - 3/27/20	\$1,365.28

Invoice Date #2	Service Period #2	Bill Amount # 2	Total Account Balance	Due Date	Payments
4/16/2020	3/17/20 - 4/16/20	\$1,209.71	\$1,475.36	5/14/2020	-
4/16/2020	3/16/20 - 4/15/20	\$298.85	\$378.94	5/14/2020	-
4/14/2020	3/13/20 - 4/14/20	\$981.57	\$1,073.27	5/12/2020	-
4/16/2020	3/17/20 - 4/16/20	\$200.98	\$308.23	4/14/2020	-
has not billed	-	-	-	4/21/2020	-